

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER  
Chairman

WILLIAM A. MUNDELL  
Commissioner

MARC SPITZER  
Commissioner

MIKE GLEASON  
Commissioner

KRISTIN K. MAYES  
Commissioner

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AZ CORP COMMISSION  
DOCUMENT CONTROL

In the Matter of Level 3 Communications, )  
LLC's Petition for Arbitration Pursuant to )  
Section 252(b) of the Communications Act of )  
1934, as amended by the Telecommunications )  
Act of 1996, and the Applicable State Laws for )  
Rates, Terms, and Conditions of )  
Interconnection with Qwest Corporation )

Docket Nos. T-01051B-05-0350  
T-03654A-05-0350

**MOTION AND CONSENT OF LOCAL COUNSEL FOR TEMPORARY PRO HAC  
VICE ADMISSION OF ERIK CECIL AND RICHARD E. THAYER**

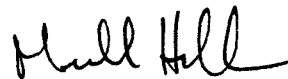
Pursuant to Rule 33(d)(3) of the Rules of the Supreme Court, Michael T. Hallam moves for admission of Erik Cecil and Richard E. Thayer as counsel pro hac vice in this action on a temporary basis on behalf of Level 3 Communications, LLC. Counsel is diligently gathering the necessary information for the verified application and expects to submit that application to the State Bar of Arizona shortly. Upon receipt of the Notice of Receipt from the State Bar of Arizona, a motion to admit Mr. Cecil and Mr. Thayer for the

1 remainder of this proceeding will be filed promptly. For information purposes, attached  
2 are copies of the Certificates of Good Standing for Mr. Cecil and Mr. Thayer.

3 Mr. Cecil and/or Mr. Thayer intend to appear at the procedural conference to be  
4 scheduled for Level 3's motion to compel and counsel therefore requests this temporary  
5 admission pro hac vice to allow such an appearance and any other appearances until the  
6 pro hac vice applications are completed. A proposed order admitting Mr. Cecil and Mr.  
7 Thayer on a temporary basis accompanies this motion.

8 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of July, 2005.

9 LEWIS AND ROCA LLP

10  
11 

12 Thomas H. Campbell  
13 Michael T. Hallam  
14 40 N. Central Avenue  
Phoenix, Arizona 85004

15 Attorneys for Level 3 Communications  
16

17  
18 ORIGINAL and thirteen (15)  
19 copies of the foregoing filed this  
20 28<sup>th</sup> day of July, 2005, with:

21 The Arizona Corporation Commission  
22 Utilities Division – Docket Control  
23 1200 W. Washington Street  
24 Phoenix, Arizona 85007

25 COPY of the foregoing hand-delivered  
26 this 28<sup>th</sup> day of July, 2005 to:

27 Jane Rodda, Administrative Law Judge  
28 Hearing Division  
29 Arizona Corporation Commission  
30 1200 West Washington  
31 Phoenix, AZ 85007

LEWIS  
AND  
ROCA  
LLP  
LAWYERS

1 Maureen Scott, Counsel  
2 Legal Division  
3 Arizona Corporation Commission  
4 1200 West Washington  
5 Phoenix, AZ 85007

6 Ernest Johnson, Director  
7 Utilities Division  
8 Arizona Corporation Commission  
9 1200 West Washington  
10 Phoenix, AZ 85007

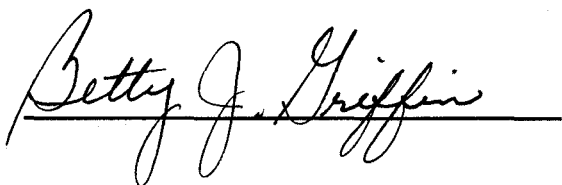
11 Copy of the foregoing mailed  
12 this 28<sup>th</sup> day of July, 2005, to:

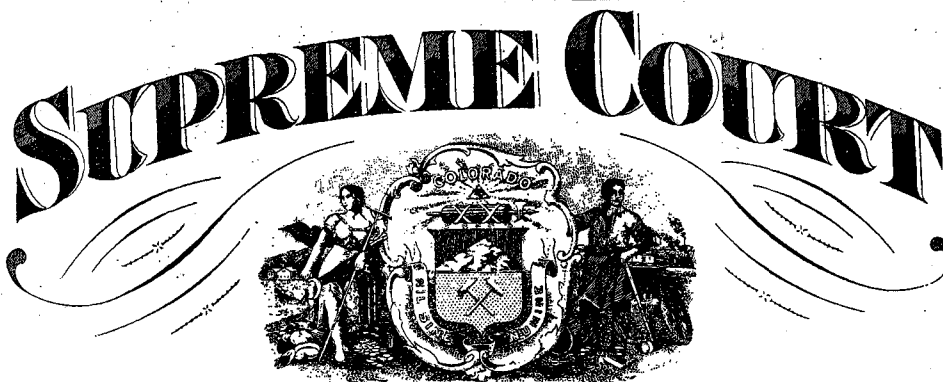
13 Timothy Berg  
14 Theresa Dwyer  
15 Fennemore Craig, P.C.  
16 3003 N. Central Avenue  
17 Suite 2600  
18 Phoenix, AZ 85012  
19 Attorneys for Qwest Corporation

20 Norman G. Curtright  
21 Qwest Corporation  
22 4041 N. Central Avenue  
23 11th Floor  
24 Phoenix, AZ 85012  
25 Attorneys for Qwest Corporation

26 Thomas M. Dethlefs  
Qwest Services Corporation  
1801 California Avenue  
10<sup>th</sup> Floor  
Denver, Colorado 80202

Ted D. Smith  
Stoel Rives LLP  
201 S. Main, Suite 1100  
Salt Lake City, Utah 84111

23   
24  
25  
26



## State of Colorado,

STATE OF COLORADO, ss:

*I, Deputy Clerk of the Colorado Supreme Court,  
do hereby certify that*

*Richard E. Thayer*

*has been admitted to practice law as a*

*Single Client Attorney*

*Pursuant To C.R.C.P 222*

*within this State; and that his name appears on  
the Supreme Court's roll of Single Client Attorneys of date the  
17<sup>th</sup> day of June, 2004 and that at the date  
hereof the said Richard E. Thayer is in good  
standing at this bar.*

IN WITNESS WHEREOF, I Have hereunto subscribed my name and  
Affix the Seal of said Supreme Court, at Denver in said state, this

11<sup>th</sup> day of July 2005

*Sharon H. Kasper*

Deputy Clerk



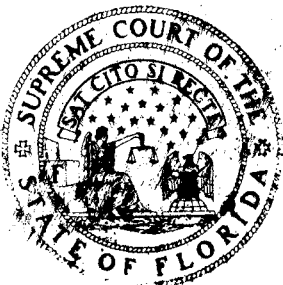
# Supreme Court of Florida

## Certificate of Good Standing

*I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that*

**RICHARD E. THAYER**

*was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on December 28, 1990, is presently in good standing, and that the private and professional character of the attorney appear to be good.*



*WITNESS my hand and the Seal of the  
Supreme Court of Florida at Tallahassee,  
the Capital, this July 12, 2005.*

By: *Dublin Causseaux*  
Chief Deputy Clerk

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*Clerk of the Supreme Court of Florida.*

# COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

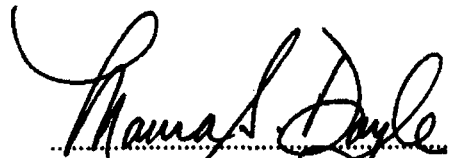
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the twenty-first day of December A.D. 1981, said Court being the highest Court of Record in said Commonwealth:

RICHARD E. THAYER

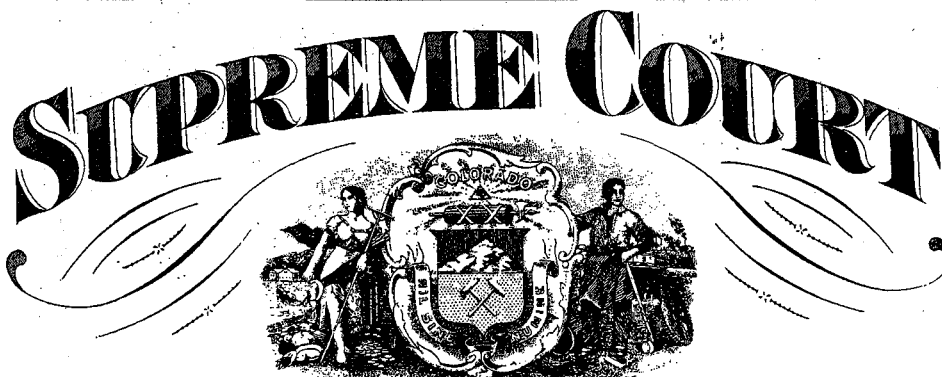
being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this fifteenth day of July in the year of our Lord two thousand and five.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.



## State of Colorado,

STATE OF COLORADO, ss:

*I, Deputy Clerk of the Colorado Supreme Court,*

*do hereby certify that*

*Eric Joseph Cecil*

*has been admitted to practice law as a*

*Single Client Attorney*

*Pursuant To C.R.C.P 222*

*within this State; and that his name appears on*

*the Supreme Court's roll of Single Client Attorneys of date the*

*17<sup>th</sup>* *day of* *June* *, 2004 and that at the date*

*hereof the said* *Erik Joseph Cecil* *is in good*

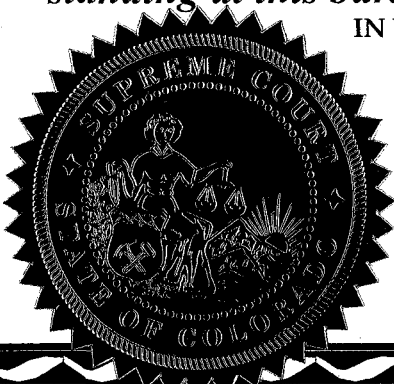
*standing at this bar.*

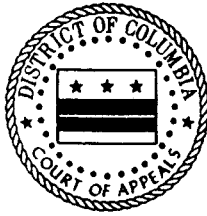
IN WITNESS WHEREOF, I Have hereunto subscribed my name and  
Affix the Seal of said Supreme Court, at Denver in said state, this

*11<sup>th</sup>* *day of* *July* *2005*

*Sharon H. Kanyler*

*Deputy Clerk*





District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

ERIK J. CECIL

was on the 7<sup>TH</sup> day of APRIL, 2003

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 14, 2005.

GARLAND PINKSTON, JR., CLERK

By:

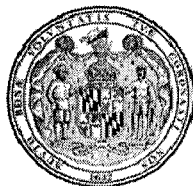
*A. Jackson*

Deputy Clerk



# Court of Appeals of Maryland

Annapolis, MD



## **CERTIFICATE OF GOOD STANDING**

STATE OF MARYLAND, ss:

I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the 25th day of JUNE, 1997 ,

**ERIK JOSEPH CECIL**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** I have hereunto set  
my hand as Clerk, and affixed the Seal of the  
Court of Appeals of Maryland, this 11th  
day of JULY, 2005.

*Alexander L. Cummings*  
Clerk of the Court of Appeals of Maryland

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER  
Chairman

WILLIAM A. MUNDELL  
Commissioner

MARC SPITZER  
Commissioner

MIKE GLEASON  
Commissioner

KRISTIN K. MAYES  
Commissioner

In the Matter of Level 3 Communications,	)	
LLC's Petition for Arbitration Pursuant to	)	Docket Nos. T-01051B-05-0350
Section 252(b) of the Communications Act of	)	
1934, as amended by the Telecommunications	)	T-03654A-05-0350
Act of 1996, and the Applicable State Laws for	)	
Rates, Terms, and Conditions of	)	
Interconnection with Qwest Corporation	)	

**ORDER REGARDING TEMPORARY PRO HAC VICE ADMISSION OF**  
**ERIK CECIL AND RICHARD E. THAYER**

Based upon the Motion and Consent of Local Counsel for Temporary Admission Pro Hac Vice of Erik Cecil and Richard E. Thayer and the consent to appear as local counsel by Michael T. Hallam, it is hereby ordered that Erik Cecil and Richard E. Thayer be admitted on a temporary basis pro hac vice as counsel for Level 3 Communications, LLC in the above entitled matter until a permanent order may be granted.

DATED this \_\_\_\_\_ day of July, 2005.

\_\_\_\_\_  
Administrative Law Judge